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10 UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

11 MICHAEL GARCIA, SALENA GARCIA,
AND R.G., a minor by and through her
12 guardians Michael Garcia and Salena
Garcia, on behalf of themselves and all
13 others similarly situated,

14 Plaintiffs,

15 v.

16 ROBLOX CORPORATION,

17 Defendant.

18 Case No. 2:25-cv-03476

19 **DECLARATION OF
BENJAMIN WHITE IN
SUPPORT OF DEFENDANT
ROBLOX CORPORATION'S
MOTION TO COMPEL
ARBITRATION**

20 *Memorandum of Points and
Authorities, Notice of Motion,
Declaration of Ronita Jit, Request
for Judicial Notice, and [Proposed]
Order filed concurrently herewith*

21 Date: November 14, 2025
22 Time: 1:30 PM
23 Dept: 9B
24 Judge: Judge Wesley L. Hsu
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1 I, Benjamin White, declare as follows:

2 1. I am an attorney at the law firm Procopio, Cory, Hargreaves & Savitch
3 LLP (“Defense Counsel”) and counsel for Defendant Roblox Corporation (“Roblox”)
4 in the above-captioned action. I am a member in good standing of the State Bar of
5 California and admitted to practice in the U.S. District Court for the Central District
6 of California. I submit this declaration in support of Roblox’s Motion to Compel
7 Arbitration (“Motion”). I have personal knowledge of the facts set forth in this
8 declaration and, if called as a witness, could and would testify competently to such
9 facts under oath.

10 **Account Information**

11 2. On May 9, 2025, Defense Counsel emailed counsel for Plaintiffs
12 (“Plaintiffs’ Counsel”) Michael Garcia, Salena Garcia, and R.G. (“Plaintiffs”)
13 requesting Plaintiffs’ Roblox usernames to facilitate Defense Counsel’s investigation
14 of Plaintiffs’ claims. On May 19, 2025, Plaintiffs’ Counsel provided the usernames
15 *****grill and ****frig for Plaintiff R.G. (“R.G.”), *****5764 for Plaintiff
16 Michael Garcia (“M.G.”), and **6455 for Plaintiff Salena Garcia (“S.G.”). I have
17 included asterisks (*) to redact the complete Username, User ID and Contact
18 information from being disclosed in this declaration and in a public case filing. Each
19 asterisk represents a redacted character. I can confirm, however, that the unredacted
20 information corresponds to the information provided by Plaintiff’s counsel. I have
21 also redacted the exhibits attached to this declaration to prevent the complete
22 Username, User ID and Contact information from being disclosed.

23 **Local Rule 7-3 Compliance**

24 3. Pursuant to Local Rule 7-3, counsel for both parties met telephonically
25 on July 21, 2025. During the call, Defense Counsel conveyed Roblox’s intent to move
26 to compel arbitration based on Plaintiffs’ acceptance of the Terms of Use. Defense
27 Counsel also requested that Plaintiffs consent to arbitration or at least agree to stay
28 briefing on Roblox’s motion to dismiss pending a ruling on arbitration. Counsel for

1 Plaintiffs (“Plaintiffs’ Counsel”) declined to consent to arbitration or stay briefing on
2 the motion to dismiss.

3 4. On July 23, 2025, Roblox filed a motion to dismiss in which it stated it
4 “will be bringing a motion to compel arbitration based on the arbitration provisions
5 contained within the Terms of Use that Plaintiffs incorporate into their Complaint and
6 accepted when signing up for the service.” Dkt. No. 17-1, fn. 1.

7 5. On August 7, 2025, Roblox served arbitration-focus discovery requests
8 on Plaintiffs.

9 6. On August 20, 2025, counsel for both parties met again via Zoom for
10 their 26f conference. During the conference, Defense Counsel reiterated Roblox’s
11 intent to move to compel arbitration and requested that the parties limit discovery to
12 arbitration issues until the Court adjudicated the motion. Plaintiffs’ Counsel declined
13 to narrow discovery and maintained that Plaintiff R.G. was not subject to any
14 arbitration agreement as a minor.

15 7. On September 5, 2025, the parties filed their 26f report, in which they
16 jointly proposed an arbitration briefing schedule. *See* Dkt. No. 28, Ex. A.

17 8. On September 5, 2025, I emailed Plaintiffs’ Counsel reiterating that
18 Roblox intended to move to compel arbitration and stating the grounds for the motion.
19 I also invited Plaintiffs’ Counsel to let me know if he believed further discussion would
20 help resolve this motion. As of October 3, 2025, Plaintiffs’ Counsel has not responded
21 to my email. Therefore, Roblox has complied with Local Rule 7-3.

22 **Discovery Responses**

23 9. On August 7, 2025, Roblox served Interrogatories, Requests for
24 Admission, and Requests for Production (collectively, “R.G. Requests”) on R.G. True
25 and correct copies of the R.G. Requests are attached hereto as **Exhibit 1**.

26 10. On August 7, 2025, Roblox served Interrogatories, Requests for
27 Admission, and Requests for Production (collectively, “M.G. Requests”) on M.G.
28 True and correct copies of the M.G. Requests are attached hereto as **Exhibit 2**.

11. On August 7, 2025, Roblox served Interrogatories, Requests for Admission, and Requests for Production (collectively, “S.G. Requests”) on S.G. True and correct copies of the R.G. Requests are attached hereto as **Exhibit 3**.

12. On September 10, 2025, R.G. served responses (“R.G. Responses”) to the R.G. Requests on Roblox. True and correct copies of the R.G. Responses are attached hereto as **Exhibit 4**.

13. On September 10, 2025, M.G. served responses (“M.G. Responses”) to the M.G. Requests on Roblox. True and correct copies of the M.G. Responses are attached hereto as **Exhibit 5**.

14. On September 10, 2025, S.G. served responses (“S.G. Responses”) to the S.G. Requests on Roblox. True and correct copies of the S.G. Responses are attached hereto as **Exhibit 6**.

15. On September 10, 2025, Plaintiffs produced documents relating to their Roblox accounts, bates numbered 000055-000057, 000078-000085, 000095-000099. True and correct copies of these documents are attached hereto as **Exhibit 7**.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed in San Diego, California, on October 6, 2025.

/s/ Benjamin White
Benjamin White